

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)
ECF Case

This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., 02-CV-6977 (GBD)(SN)

**MOTION TO VACATE AND GRANT A CORRECTED FINAL JUDGMENT FOR
COMPENSATORY AND PUNITIVE DAMAGES FOR CONSCIENCE PAIN AND
SUFFERING AS TO THE ESTATE OF THOMAS HUGHES ONLY**

For the reasons set forth in the declaration of James P. Kreindler, attached hereto, the *Ashton* plaintiffs, by and through counsel, Kreindler & Kreindler LLP, respectfully move this Court to vacate its March 8, 2016 Amended Order of Judgment for compensatory and punitive damages for conscious pain and suffering as to Thomas Hughes only (MDL ECF No. 3226 and 02-cv-6977 ECF No. 783, at 5, line 307), and issue a final judgment to correct an error in listing decedent Timothy Hughes, who was killed in the terrorist attacks on September 11, 2001, as Thomas Hughes.

Dated: May 18, 2020
New York, NY

/s/ James P. Kreindler
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